



THAME

Town Council

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Graham Hunt, Town Clerk & RFO

GM/AO

Ms Joan Desmond
Planning Department
South Oxfordshire District Council
135 Eastern Avenue
Milton Park
Milton
OX14 4SB

18 October 2018

Dear Ms Desmond

Planning Application No: P18/S3143/O Daf Trucks Ltd Eastern Bypass Thame OX9 3FB

The above planning application was considered by Thame Town Council at its Full Council meeting of 16 October 2018.

Recommendation:

Thame Town Council **objects** to this application, on the following grounds. More detail is provided further below:

- The proposal is contrary to the Thame Neighbourhood Plan (TNP) Policy WS12 in proposing non-B1-B8 uses on an identified employment area;
- The principle of residential use only applies as far as the permitted development scheme P17/S4127/PDO allows, and is not material to this comprehensive proposal;
- The need for housing is less relevant to Thame than the need for available employment land;
- The site available for purchase or rent has been deliberately made unattractive to the market;
- Access to public transport is not as described within the applicant's Transport Assessment September 2018;
- The Oxfordshire Clinical Commissioning Group have again objected to the care home over concerns of the sustainability of local services to cope with the inevitable rise in specific care needs.

Principle of development

In the proposal, the applicant has sought to replace the loss of potential jobs from the warehouse unit only. It has been assumed by the applicant that as permitted development rights exist to convert the DAF building to flats, the employment floorspace and land beneath it can be discounted as lost. This is simply not the case; this new application involves the demolition of the structure within which the right to develop the homes exists, and a further comprehensive redevelopment of the whole

site. This effectively removes the permitted development scheme as a material consideration when deciding this application.

Employment Land – TNP Policy WS12

The loss of employment land and floorspace would be extremely regrettable. The proposal is contrary to Policy WS12 of the TNP, in seeking alternative uses on an existing employment site. Combined with loss from other sites and permitted development schemes the Town Council would have to seek redress within any revision to the Thame Neighbourhood Plan. This would mean seeking land on greenfield sites, in the absence of opportunities to intensify on existing employment sites.

Policy WS12 is not without flexibility, however. To be available, buildings or land declared redundant must have been proved as being no longer viable, and the site marketed at a reasonable price for at least a year before alternative, non B1-B8 uses can be considered. The applicant has sought to demonstrate this through their submitted Employment Viability Statement (EVS of September 2018).

With the permitted development agreed on the former DAF headquarters, it is claimed that the District Council suggested that only the warehouse land and floorspace needed to be marketed. That advice may well have been given before this comprehensive application was discussed. The applicant claims through their EVS that the unit would be advertised for sale or rent, with a willingness to refurbish, should the client request it. It is claimed that due to a lack of stock along the M40 corridor, prices are buoyant. A variety of marketing initiatives are claimed including mail-outs, advertising on commercial websites and registering with commercial property listings. Within their Statement, the applicant is trying to demonstrate a thorough, rigorous approach to the marketing of a site they themselves have compromised.

Appendix 6 of the applicant's EVS shows the building and land marketed for the purpose of their exercise, shown by a red line. Of concern to any future prospective tenant or owner would be:

- the purpose, and function of the rest of the site;
- how HGVs will operate in an immediate environment with the residents, including vulnerable care home residents;
- how access would be ensured in perpetuity;
- how maintenance could be carried out on the eastern flank of the building without any adjoining land in the tenant's control;
- the undeclared purpose of the southern-most strip of land immediately to the south of the warehouse building.

In marketing only a part of the site, making very public claims of the proposed uses for the remainder, leaving the purpose of other adjoining parts vague, and in denying a buffer to the potential employment site the applicant has sought to constrain interest from prospective tenants.

The applicant states in paragraph 5.12 of the EVS that Fields, the local commercial property experts, were asked to review the basis on which the property was being advertised. The letter from Fields is contained in Appendix 2 of the EVS. It does not actually state the property has been advertised, as claimed by the applicant, "on

reasonable terms supported by local comparable evidence”; it only agrees the approach to marketing in terms of flexibility of tenure has been reasonable and gives an independent view on likely final rental values. It does not offer a comparison with the rental prices asked of prospective tenants, and sale values are not mentioned at all. The significance of Field’s letter is therefore very limited.

Within section 4 of the EVS details of the rates and flexibilities offered to prospective clients are given. It is worth noting that the starting prices declared are close to those quoted by Fields as being reasonable. It is likely, however, that no prices ever had to be quoted, if the claimed level of interest is true as prices were only to be released at the point at which negotiations started.

It is stated within paragraph 5.16 of the EVS that little interest was shown as the site is not attractive, being distant from the M40 junction and being constrained for some uses by being surrounded by residential properties. This is in stark contrast to the success of Cotmore Wells, immediately opposite, not to mention the remainder of Howland Road and the ongoing regeneration of industrial areas off Wenman Road.

The applicant claims that land identified through the 2012 Core Strategy, and that proposed at Rycote Lane in the neighbouring parish of Great Hasely would in some way compensate for the loss of this employment site. It has been reported by SODC that 98% of industrial floorspace within Thame is occupied. Shortly following this announcement, planning application P18/S042/FUL in Jefferson Way, Thame, was granted in order to allow the refurbishment of much of the vacant floorspace. A healthy employment floorspace vacancy rate is typically rated at 10%, across the “B” use classes. This proposal would therefore harm the vitality of Thame’s employment offer in removing employment land and floorspace from supply.

The applicant claims that both schemes together will result in the provision of 170 jobs. This would still be 70 jobs short of what the existing offices alone could yield. As an identified employment site within the Thame Neighbourhood Plan however, the site is retained for the provision of “B” class employment. Those within the care home, although of definite value, could not count towards offsetting the loss of employment on this site. The proposal, in proposing the loss of employment space in part or whole against an underlying shortfall is undoubtedly contrary to Policy WS12 of the TNP.

Housing

The District declared on 29th April 2018 that they can demonstrate a 5.4 year supply of housing land. Since then, the District have, partly through reworking their housing need methodology in order to test the supply, declared a housing land supply in excess of 7 years. The 5 year supply has / will be tested at planning appeal. This matter now has less significance; on 12 September 2018 the Secretary of State for Housing, Communities and Local Government confirmed through a Written Ministerial Statement that all Oxfordshire planning authorities were to benefit from a lowered bar for housing supply of only 3 years. Ironically, one of the purposes of the Written Ministerial Statement is that the District should be given freedom to plan for both the identification of housing development opportunities, and their delivery, without being continually hindered by distracting non-policy compliant development schemes such as this current proposal.

The provision of housing, although a matter of importance, will not be the material consideration it has been in recent years.

Transport Matters

The applicant's transport assessment demonstrates the nearest convenience store is over 1.2 km away, at the BP/Marks & Spencer petrol filling station on Park Street (Part 1, Table 3.1). The applicant claims this is a 15-minute walk from the proposed development. It is considered that staff, occupants and visitors will not have suitable access for even the most basic of convenience store items.

The site does, however, benefit from close proximity to the Phoenix Trail, part of National Cycle Route 57. Within the Transport Statement (September 2018) it is proposed that the public footpath that runs along the site's southern boundary is diverted onto the Phoenix Trail. Further reference is made to the provision of a footpath from Towersey Road to the Phoenix Trail along the site's western boundary within the Planning Statement (paragraph 5.56). It is assumed this refers to providing a link to Pickenfield, not the Towersey Road.

The Transport Assessment September 2018 refers to multiple bus services. The 280 service is the only one that serves the bus stop adjacent to the site, just 5 times per day between 06:15 and 19:15. It is claimed one other service comes within 900 metres of the site, the 40, which drives along Towersey Road (which is physically impossible due to the permanent stopping up of the eastern end of the Towersey Road; the service travels down Queens Road and joins the B4012 / Howland Road at the Kingsey Road, several hundred metres further on). Others, such as the 113, are village connecting services that do not run daily, and not at all after 6pm. With 3 shifts of staff to cater for within the care home scheme alone, it appears that buses may not figure strongly as a method of access for employees or residents.

Principle – care home

The NPPF, planning practice guidance, ministerial statements and announcements are clear. It is the strategic role of the Local Planning Authority, through their housing needs assessments and local plans, in ensuring that sufficient care homes and other types of accommodation for older people are planned for and made available.

The development would therefore provide accommodation for which there is no current identified local need, although undoubtedly some need must exist. The proposal could, however, have the undesirable effect of bringing high dependency people into the area without the matching infrastructure to help accommodate their needs. This is why the Government have recognised that such provision should be planned strategically, in order to avoid harmful outcomes for local health provision.

The Oxfordshire Clinical Commissioning Group have again objected to the care home as the new facility would put pressure on an already stretched primary care service. They have once more welcomed the opportunity to discuss the plans in detail, with the applicant. It is clear that the applicant has not approached either the local CCGs or NHS Trusts in order to establish if sufficient infrastructure exists in terms of physical infrastructure and specialist healthcare experts in order to cope with the expected considerable uplift in complex health and care needs that will not be met by the care home staff.

Should you have any further questions on this, any other matter, then please do not hesitate in contacting us.

Yours sincerely

A handwritten signature in black ink, appearing to read 'G. Markland'.

Graeme Markland
Neighbourhood Plan Continuity Officer